

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF THE COFINA SENIOR BONDHOLDERS'
COALITION REGARDING ITS REQUEST TO BE HEARD
AT THE DECEMBER 20-21, 2017 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The COFINA Senior Bondholders' Coalition² submits this informative motion in response to the Court's *Order Regarding Procedures for Attendance, Participation and Observation of*

¹ The Debtors in these Title III cases, along with each Debtor's respective bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The members of the COFINA Senior Bondholders' Coalition are Fideicomiso Plaza and the following entities, either as beneficial holders or on behalf of managed funds and accounts: Aristeia Horizons, L.P.; Canary SC Master Fund, L.P.; Canyon Capital Advisors LLC (on behalf of its participating clients); River Canyon Fund Management LLC (on behalf of its participating clients); Cyrus Capital Partners, L.P.; Decagon Holdings 1, L.L.C.; Decagon Holdings 2, L.L.C.; Decagon Holdings 3, L.L.C.; Decagon Holdings 4, L.L.C.; Decagon Holdings 5, L.L.C.; Decagon Holdings 6, L.L.C.; Decagon Holdings 7, L.L.C.; Decagon Holdings 8, L.L.C.; Decagon Holdings 9, L.L.C.; Decagon Holdings 10, L.L.C.; GoldenTree Asset Management LP; Old Bellows Partners LP; Scoggin Management LP; Taconic Master Fund 1.5 L.P.; Taconic Opportunity Master Fund L.P.; Tilden Park Capital Management LP.; and Whitebox Advisors, LLC.

December 20-21, 2017 Omnibus Hearing (Dkt. No. 1893) (the “Order”), and respectfully states as follows:

2. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the COFINA Senior Bondholders’ Coalition, requests to be heard at the December 20-21 Hearing. Mr. Kirpalani will appear in person in Courtroom 17C of the United States District Court for the Southern District of New York. Mr. Kirpalani intends to be heard regarding the following Documents (as defined in the *Third Amended Notice, Case Management and Administrative Procedures*, Case No. 17-3283 (Dkt. 1512-1)) filed by the COFINA Senior Bondholders’ Coalition:

- *Omnibus Opposition of the COFINA Senior Bondholders’ Coalition to the Scope Narrowing Motions*, Adv. Proc. No. 17-257-LTS (Dkt. 143)
- *Statement in Support of, and Joinder to, Ambac Assurance Corporation’s Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004*, Case No. 17-3283-LTS (Dkt. 1905)

3. One additional attorney representing the COFINA Senior Bondholders’ Coalition will personally attend the December 20-21 Hearing in Courtroom 17C of the United States District Court for the Southern District of New York.

4. The COFINA Senior Bondholders’ Coalition reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned jointly-administered Title III cases to the extent it impacts COFINA or the interests of the COFINA Senior Bondholders’ Coalition.

DATED: December 15, 2017

Respectfully submitted,

REICHARD & ESCALERA

By : /s/ Rafael Escalera
Rafael Escalera
USDC No. 122609
escalera@reichardescalera.com

/s/ Sylvia M. Arizmendi
Sylvia M. Arizmendi
USDC-PR 210714
arizmendis@reichardescalera.com

/s/ Fernando Van Derdys
Fernando Van Derdys
USDC-PR 201913
fvander@reichardescalera.com

/s/ Carlos R. Rivera-Ortiz
Carlos R. Rivera-Ortiz
USDC-PR 303409
riverac@reichardescalera.com

/s/ Gustavo A. Pabón-Rico
Gustavo A. Pabón-Rico
USDC-PR 231207
pabong@reichardescalera.com

255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, Puerto Rico 00917-1913

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Susheel Kirpalani (*pro hac vice*)
susheelkirpalani@quinnemanuel.com

Eric Winston (*pro hac vice*)
ericwinston@quinnemanuel.com

Daniel Salinas
USDC-PR 224006
danielsalinas@quinnemanuel.com

Eric Kay (*pro hac vice*)
erickay@quinnemanuel.com

Kate Scherling (*pro hac vice*)
katescherling@quinnemanuel.com

Brant Duncan Kuehn (*pro hac vice*)
brantkuehn@quinnemanuel.com

51 Madison Avenue, 22nd Floor
New York, New York 10010-1603

Co-Counsel to the COFINA Senior Bondholders' Coalition

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz
USDC-PR 303409